USAF Foreign Disclosure and

Technology Transfer Oversight Program

Foreign Disclosure and Technology Transfer Division

Deputy Under Secretary of the Air Force, International Affairs

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Program Purpose Statement

1. **PURPOSE:** The purpose of the staff assistance oversight program is to evaluate how USAF major commands (MAJCOMs) are implementing and managing their foreign disclosure and technology transfer programs.

2. **AUTHORITY:** The National Disclosure Policy directs that department and agency heads shall designate a principal disclosure authority who shall be responsible for the direction and administration of the department or agency foreign disclosure program. Heads of all departments and agencies which have need to disclose classified military information shall establish procedures and channels to assure that disclosures are considered, authorized and handled in accordance with the National Disclosure Policy. Further, it is in the national interest to expedite decisions on disclosure of classified military information. All departments and agencies which are responsible for implementation of this policy will issue detailed directives and instructions which assure that disclosure decisions are made promptly and disclosure activities under their jurisdiction are carried out effectively. SECAF Order 114.1 designates SAF/IA as the principal disclosure authority for the Air Force. The Foreign Disclosure and Technology Transfer Division (SAF/IAD) implements the Air Force Foreign Disclosure and Technology Transfer Program on behalf of SAF/IA.

3. **CRITERIA:**

   a. SAF/IAD evaluators will normally make assessments based on their staff assistance visits to MAJCOM foreign disclosure offices (FDOs). However, evaluators may also choose to visit subordinate activities, with or without MAJCOM FDO representation. The purpose of visits to subordinate activities will be to verify various aspects of MAJCOM program implementation.

   b. The oversight program includes not only the staff assistance visit, but also planning activities to prepare the evaluator(s) for the visit. Specific activities are documented in the Evaluator Preparation Activities Section (Atch 1).

   c. Evaluators will assess performance based on a standard set of criteria which are documented in the Oversight Evaluation Criteria Section (Atch 2). The criteria represent program areas for which MAJCOMs may have responsibilities. Therefore, all criteria may not apply to all FDOs. How each MAJCOM chooses to implement these program areas may be different. Therefore, the evaluator should establish that the MAJCOM activities are adequate to meet the objective, and not whether we agree with the methods used.

   d. The criteria contain evaluator hints to assist in assessing the office's performance.

   e. A report of the evaluation visit should be completed within 10 working days of the completion of the visit.

Evaluator Preparation Activities	

	Completed
1. Send out the visit announcement message to the 0-6/GS-15 with assigned FDO responsibilities at least 30 working days in advance to formally announce the visit. -- Prior to release of the message, pre-coordinate the visit dates with the FDO. Make certain that the FDO(s) are available and the 0-6/GS-15 is available during the proposed visit dates for both an in-brief and out-brief.	

2. In order to prepare for the visit as much as possible in advance, it will be necessary to analyze data about the disclosure activity to be visited prior to the arrival of the staff assistance team. Data necessary for visit preparation will come from both IADX and the office to be visited. In the visit announcement message, task the FDO to provide the following information. IAD should receive the information at least 10 working days prior to the projected visit start date.
 	
a. The FDO provides:
 	
            - A copy of the FDO designation letter
            - An organizational diagram of the command structure that they support
            - A list of the disclosure officers assigned to the office, whether these officers have full-time or part-time disclosure responsibilities and a brief description of each individual's disclosure responsibilities
            - A list of all subordinate disclosure offices within the command to include the FDO's names and functional address symbols
            - A list of current DDLs--the DDL designation and date of document is sufficient--that the office has on file
            - A list of extended foreign visitors serviced by the office
            - The number of unclassified, confidential, secret and top secret information releases made in the past six months
            - A description of any formal disclosure education briefings, presentations or other education initiatives that have been completed in the past year
            - The average processing time for document requests by the office and identifies how the office measures this metric
            - The average time to redelegate disclosure authority to subordinate activities and identifies how the office measures this metric	

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Evaluator Preparation Activities

	Completed

b. IADX provides:
 	
       - A list of command FDOs based on our POC list
       - A list of command personnel who have attended the USAF FDO training course
       - A list of DDLs delegated to the command
       - A list of FORDTIS users at the site, report on the office's CMI entries, and data regarding foreign visits processing by the office	

3. Review the following guidance before the visit: --AFI 16-201 AFI 16-207 AFI 16-110 AFI 16-204 --AFI 61-205 --USAF Disclosure Advisories --USAF Disclosure Guidelines --USAF Disclosure Education Tools	
4. Review selected staff assistance reports on file for crossfeed purposes.	
5. Identify if any of the IAD branches have specific problems or issues coming out of the command or its subordinate units.	
6. Identify if other IA divisions (for example regions, IAW, etc.) know about disclosure related problems from SPOs or other users.	
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Oversight Evaluation Criteria

COMMAND MANAGEMENT - This element evaluates the level of command support/ interest the foreign disclosure and technology transfer program receives. There should be enough support/interest so that disclosure officers can implement their responsibilities. The following are indicators of command support/interest:

1. Has the MAJCOM, FOA, or DRU commander designated one or more individuals as command FDOs?
    -- Is the designation in writing?
    -- Are FDOs at headquarters and subordinate elements organizationally aligned with overall management and oversight responsibilities for international programs/ activities?
    -- Are FDO ranks/grades equivalent to other assigned personnel with similar responsibilities?
    -- Do FDO supervisors report directly to O-6/GS-15 managers?
    -- Are O-6/GS-15 managers formally accountable for support and advocacy of their assigned foreign disclosure functions?

2. What is the nature of the FDO's access to the organization and MAJCOM, FOA or DRU commander?

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Oversight Evaluation Criteria

COMMAND MANAGEMENT (CONT) - This element evaluates the level of command support/interest the foreign disclosure and technology transfer program receives. There should be enough support/interest so that disclosure officers can implement their responsibilities. The following are indicators of command support/interest:

3. Does the commander ensure sufficient resources are in place to implement the foreign disclosure and technology transfer program?
 -- How many disclosure officers are there and what is their workload?
 -- Are individuals performing disclosure duties on a full-time or part-time basis?
 -- Does the commander ensure sufficient resources are in place to implement the foreign disclosure and technology transfer program?
 -- Are there adequate resources to handle the workload?

4. Have disclosure officers approving releases of classified information received formal training from SAF/IA?
 -- What other training/educational opportunities have been made available to the foreign disclosure officers?

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Oversight Evaluation Criteria

COMMAND MANAGEMENT (CONT) - This element evaluates the level of command support/interest the foreign disclosure and technology transfer program receives. There should be enough support/interest so that disclosure officers can implement their responsibilities. The following are indicators of command support/interest:

5. Do disclosure officers have adequate electronic connectivity (computers, FORDTIS, phones, fax machines, etc.) to facilitate expeditious coordination with supported offices and higher headquarters FDOs?

6. What concerns does the 0-6/GS-15 with assigned FDO responsibilities have regarding implementation of the foreign disclosure and technology transfer program?

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Oversight Evaluation Criteria

FOREIGN DISCLOSURE AND TECHNOLOGY TRANSFER PROGRAM MANAGEMENT - This element evaluates how the MAJCOM FDO is organized to implement its program management responsibilities within the command. The command FDO should be knowledgeable about the command's effectiveness and efficiency in implementing the program. The following are indicators of the command FDO's management emphasis:

1. Does the office have AFI 16-201 and disclosure advisories on file to understand program requirements?

2. Has the MAJCOM, FOA or DRU FDO provided SAF/IAD with current information on all appointed subordinate FDOs to include names, functional address symbols and telephone numbers?

3. Can the FDO explain the command's methodology regarding redelegation of disclosure authority?

4. Can the FDO explain how it evaluates its effectiveness and efficiency and that of its subordinate disclosure offices in meeting the foreign disclosure and technology transfer requirements of supported organizations?

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Oversight Evaluation Criteria

FOREIGN DISCLOSURE AND TECHNOLOGY TRANSFER PROGRAM MANAGEMENT - This element evaluates how the MAJCOM FDO is organized to implement its program management responsibilities within the command. The command FDO should be knowledgeable about the command's effectiveness and efficiency in implementing the program. The following are indicators of the command FDO's management emphasis:

5. Does the FDO have a suspense management program in place which ensures that disclosure taskings are responded to in a timely manner?
    -- Does the office process document requests in 10 days generally?
    -- Does the office generally return visit approvals/denials to the requester 5 days in advance of the visit start date?

6. Are all command redelegations of disclosure authority documented in writing with a copy to SAF/IAD?
    -- What is the average turnaround time for redelegating authority to the field?
    -- How does the command keep track of its redelegations?

Oversight Evaluation Criteria

FOREIGN DISCLOSURE AND TECHNOLOGY TRANSFER PROGRAM MANAGEMENT - This element evaluates how the MAJCOM FDO is organized to implement its program management responsibilities within the command. The command FDO should be knowledgeable about the command's effectiveness and efficiency in implementing the program. The following are indicators of the command FDO's management emphasis:

7. Have all command personnel who authorize the release of classified information received SAF/IAD training?

8. Does the command have a foreign disclosure and technology transfer education/outreach program?
    -- What organizations or audiences are have been the recipients of education/outreach initiatives?
    -- What types of initiatives have been carried out under the program?
    -- What education objectives have been achieved under these initiatives?

Oversight Evaluation Criteria

FOREIGN DISCLOSURE AND TECHNOLOGY TRANSFER PROGRAM MANAGEMENT - This element evaluates how the MAJCOM FDO is organized to implement its program management responsibilities within the command. The command FDO should be knowledgeable about the command's effectiveness and efficiency in implementing the program. The following are indicators of the command FDO's management emphasis:

9. Has the FDO established continuing relationships with base security and/or counterintelligence organizations?
    -- What is the purpose of these relationships?
    -- How does the FDO rate the success of these relationships?

10. Does the FDO document its release decisions in FORDTIS?

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Oversight Evaluation Criteria

DELEGATED DISCLOSURE AUTHORITY - This element evaluates how FDOs at any command level implement their delegated disclosure authority. The FDO should be able to perform two major functions regarding delegated authority: 1) approve releases for which authority has been delegated and 2) prepare sufficient justification to the appropriate command level when delegated authority has been exceeded. The following are indicators whether the FDO understands how to exercise its authority:

1. Does the command have the current versions of delegations that IAD has transmitted to them?
    -- Is the file consistent with IAD records

2. Does the command have a process for evaluating requests for release of CMI or CUMI?
    -- Are decisions to release/deny or return incomplete requests, coordinate an extension or refer requests to another authority made within 10 working days of receiving the request?

3. Does the FDO have records for the past six months regarding information requests processed?
    -- How many unclassified, confidential, secret and top secret cases were processed?
    -- Does a random sampling show the FDO's decisions were consistent with its delegated authority?
    -- Can any trends be established by a random review of denials? For example, do denials indicate action should be taken to update delegated authority?

Oversight Evaluation Criteria

DELEGATED DISCLOSURE AUTHORITY - This element evaluates how FDOs at any command level implement their delegated disclosure authority. The FDO should be able to perform two major functions regarding delegated authority: 1) approve releases for which authority has been delegated and 2) prepare sufficient justification to the appropriate command level when delegated authority has been exceeded. The following are indicators whether the FDO understands how to exercise its authority:

4. Can the FDO explain the command process for working disclosure cases when the command delegated authority has been exceeded?
     -- Can the FDO explain the difference between one-time and continuing authority?
     -- Do requests to SAF/IAD contain all the necessary information IAW AFI 16-201 for action to be taken?
     -- How are requests for release of non-USAF information handled?

Oversight Evaluation Criteria

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5. Does the FDO know the requirements which must be met before release of approved information can occur?

6. Does the FDO provide disclosure guidance to USAF personnel traveling overseas or to conferences where foreign nationals will be in attendance?
    -- How is this accomplished?

7. Has the FDO experienced problems with either higher headquarters or subordinate activities in responding to release requests?
    -- If so, what specific problems need to be addressed?

Oversight Evaluation Criteria

DELEGATED DISCLOSURE AUTHORITY - This element evaluates how FDOs at any command level implement their delegated disclosure authority. The FDO should be able to perform two major functions regarding delegated authority: 1) approve releases for which authority has been delegated and 2) prepare sufficient justification to the appropriate command level when delegated authority has been exceeded. The following are indicators whether the FDO understands how to exercise its authority:

8. Is the FDO promptly notified IAW DoD 5200.1-R/AFI 31-401 when any foreign nation is suspected of compromising U.S. Air Force classified information?

    -- Can the FDO explain what actions are taken by his/her office subsequent to any notifications of suspected compromise.

Oversight Evaluation Criteria

TECHNOLOGY TRANSFER - This element evaluates how FDO's at any command level implement their responsibilities in support of commercial international programs or commercial aspects of foreign military sales programs. The FDO should be ableto advise/ assist supported personnel determine when USAF sponsorship of commercial activities is appropriate and apply disclosure policies to acquisition related activities. The following are indicators whether FDO activities understand and comply with International Traffic in Arms Regulations:

1. Has the FDO sponsored or recommended sponsorship for any visits to contractor facilities?
   -- If so, what were the conditions of the approval?

2. Does the FDO comply with IAD guidelines for granting exemptions to the ITAR?

3. Does the FDO review proposed command contractors before contract announcement in the Commerce Business Daily.

4. Do FDO's know that once foreign ownership issues have been mitigated and a U.S. facility clearance is granted release of classified military information does not require a disclosure review?

Oversight Evaluation Criteria

INTERNATIONAL VISITS PROGRAM - This element evaluates how FDOs at any command level implement their responsibilities in support of visits and assignments of foreign personnel to USAF organizations. The following are indicators whether FDOs understand the relationship between foreign disclosure and technology transfer policies and the International Visit Program.

1. For FVS OPRs, how many visits are received which must be transferred to other OPRs?

2. For FVS OPRs, are visits transferred to you in a timely manner from other OPRs?

3. Does the office have a suspense program for managing its visit program
   -- What is the average turnaround time from receipt to staffing of a visit request?
   -- Are there coordinating offices which are consistently missing suspenses?
   -- What actions are taken to follow up on missed suspenses?
   -- Are visit approvals/denials generally forwarded no less than 5 working days prior to visit start date?

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Oversight Evaluation Criteria

INTERNATIONAL VISITS PROGRAM - This element evaluates how FDOs at any command level implement their responsibilities in support of visits and assignments of foreign personnel to USAF organizations. The following are indicators whether FDOs understand the relationship between foreign disclosure and technology transfer policies and the International Visit Program.

4. Does the FDO have a process for approving one-time and recurring visits?
   -- Can the FDO explain the process?
   -- What is the process for denying visits?
   -- How are decisions reached for visits regarding orientation or non-program specific requests?
   -- With which offices does the FDO coordinate visits?

5. Does the FDO assist visit POCs in evaluating visit requests?
   -- Can the FDO explain the information provided to POCs to conduct the visit.

6. For FVS visit OPRs, what problems, if any, are you experiencing with embassy staffs, requests or visitors?

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Oversight Evaluation Criteria

INTERNATIONAL VISITS PROGRAM - This element evaluates how FDOs at any command level implement their responsibilities in support of visits and assignments of foreign personnel to USAF organizations. The following are indicators whether FDOs understand the relationship between foreign disclosure and technology transfer policies and the International Visit Program.

7. For non-FVS OPRs, what visit problems, if any are you experiencing with SAF/IAD, requests or visitors?

8. Can the FDO explain the coordination and approval process for extended visits (foreign liaison officers, cooperative program personnel and exchange officers--MPEP and ESEP)?

9. Is the following documentation on file regarding extended visitors:
    -- FVS extended visit approval
    -- extended placement package which identifies the U.S. contact officer, contains a position description, security plan, and list of any intermittent visit locations.
    -- disclosure authority permitting information releases to the individual(s)
    -- any other documentation required by other governing directives

Oversight Evaluation Criteria

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10. Have extended visitors been provided a badge which clearly identifies them as foreign nationals?

11. Have extended visitors been advised of the conditions of their placement in the organization? For example, what their duty hours are, areas for which they are permitted unescorted entry, who their U.S. contact officer is, etc?

12. Does the FDO have any problems with extended visitors?